



United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

**MEMO ENDORSED**

February 22, 2017

By ECF

Honorable John G. Koeltl  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
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DATE FILED: 2-24-2017

Re: *Flores v. United States Department of Justice*, 17 Civ. 0036 (JGK)

Dear Judge Koeltl:

This Office represents defendant United States Department of Justice (the "Government") in the above-referenced matter, which was filed by plaintiff Louis Flores (the "Plaintiff") pursuant to the Freedom of Information Act, 5 U.S.C. § 552. I submit this letter on behalf of my colleague, Assistant United States Attorney ("AUSA") Rebecca S. Tinio, to request a three-week extension—from February 27, 2017 to March 20, 2017—of the Government's deadline to respond to the complaint.


AUSA Tinio has been handling this matter since its inception. Yesterday morning, however, she learned of a serious illness in her immediate family that will require her to be out of the office (and away from New York), and unable to work on this or other matters, for an undetermined period. The Government therefore respectfully requests this extension to allow AUSA Tinio time to return to the office or to make other arrangements necessary for the Government to respond to the complaint. This is the Government's first request for an extension of its deadline to respond to the complaint. Plaintiff does not consent to the request for an extension, as indicated in the attached e-mail exchange. The Government understands that Plaintiff also intends to submit a letter opposing the extension request. We thank the Court for its consideration of this matter.

*The requested extension is granted.  
DC #6 resolved.*

Respectfully submitted,

PREET BHARARA  
United States Attorney for the  
Southern District of New York

**SO ORDERED:**

  
HON. LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT JUDGE  
Part I

By: /s/ Andrew E. Krause  
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Attachment

cc: Louis Flores, Plaintiff  
(via e-mail and U.S. Mail)